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11 *Attorneys for Defendant/Counter-Claimant, KE Aloha Holdings, LLC*

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 JAMES W. PENGILLY, a Nevada resident,

11 Plaintiff,

12 v.

13 NEVADA ASSOCIATION SERVICES,
14 INC., a Nevada corporation; MARK A.
15 STUHMER, a Nevada resident; DOUGLAS
16 L. CROOK, a Nevada resident; BILL
17 BLANCHARD, a Nevada resident;
18 KENNETH R. SAILLEY, a Nevada resident;
19 ERIKA GEISER, a Nevada resident; KE
20 ALOHA HOLDINGS, LLC, a Nevada limited
21 liability company; DOES I through X,
22 inclusive; ROE CORPORATIONS I through
23 X, inclusive,

20 Defendants.

21 KE ALOHA HOLDINGS, LLC, a Nevada
22 limited liability company,

23 Counter-Claimant,

24 v.

25 JAMES W. PENGILLY, an individual;
26 AMANDA M. PENGILLY, an individual;
27 JAMES W. PENGILLY and AMANDA M.
28 PENGILLY, as Trustees of the James W.
Pengilly Trust, dated September 22, 2003;
GREEN TREE SERVICING, LLC, a
Delaware limited liability company; UNITED
STATES INTERNAL REVENUE SERVICE;

CASE NO. 2:14-cv-01463-RFB-NJK

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND BRIEFING
SCHEDULE ON DITECH FINANCIAL
LLC'S MOTION TO AMEND REPLY
TO COUNTERCLAIM [ECF NO. 165]**

1 BANK OF AMERICA, National Association;
2 and any and all other persons unknown
3 claiming any right, title, estate, lien or interest
4 in the Property adverse to the Plaintiff's
ownership or any cloud upon Plaintiff's title
thereto (DOES 1 through 10, inclusive),

5 Counter-Defendants.

6 GREEN TREE SERVICING, LLC, a
7 Delaware limited liability company,

8 Counter/Cross-Claimant,

9 v.

10 KE ALOHA HOLDINGS, LLC; NEVADA
11 ASSOCIATION SERVICES, INC., a Nevada
12 corporation; WEST CHARLESTON LOFTS
OWNERS ASSOCIATION, a domestic non-
13 profit corporation; and DOES I through X,
inclusive,

14 Counter/Cross-Defendants.

15 COMES NOW, Defendant/Counter-Claimant/Counter/Cross-Defendant, KE Aloha
16 Holdings, LLC ("KE Aloha") by and through its attorneys of record, Michael Beede, Esq. and
17 James W. Fox, Esq. of The Law Office of Mike Beede, PLLC; and Counter-
18 Defendant/Counter/Cross-Claimant, Ditech Financial LLC f/k/a Green Tree Servicing, LLC
19 ("Ditech"), by and through its attorney of record, Colt B. Dodrill, Esq. of the law firm of Wolfe
& Wyman LLP, and hereby stipulate as follows:

- 20 1. This matter concerns title to real property commonly known as 11411 Allerton Park
21 Drive, Unit #411, Las Vegas, NV 89135 (the "Property").
- 22 2. On March 12, 2018, Ditech filed its Motion to Amend Reply to Counterclaim (Second
23 Request) [ECF No. 165]
- 24 3. The Court set a deadline of March 26, 2018 to file any opposition to Ditech's Motion.
- 25 4. The parties hereby stipulate to continue the deadline for KE Aloha to file an Opposition
26 to Ditech's Motion [ECF No. 165] by two (2) weeks, until the date of April 9, 2018.

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1 This is the parties' first request for a modification of the briefing schedule and it is not
2 intended to cause any delay or prejudice to any party.

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4 Dated this 26th day of March, 2018.
THE LAW OFFICE OF MIKE BEEDE, PLLC

5
6 /s/ Michael Beede, Esq.

7 Michael Beede, Esq.
8 Nevada Bar No. 13068
9 James W. Fox, Esq.
10 Nevada Bar No. 13122
2470 St. Rose Pkwy, Suite 201
Henderson, NV 89074
Attorneys for KE Aloha Holdings, LLC


Dated this 26th day of March, 2018.
WOLFE & WYMAN LLP

/s/ Colt Dodrill, Esq.

Colt B. Dodrill, Esq.
Nevada Bar No. 9000
6757 Spencer Street
Las Vegas, NV 89119
*Attorney for Ditech Financial LLC f/k/a
Green Tree Servicing, LLC*

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16 **ORDER**

17 **IT IS SO ORDERED.**

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19 
20 RICHARD F. BOULWARE, II
United States District Court

21 DATED: March 27, 2018.

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